

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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JUL 27 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)	
)	
Petition for Rulemaking to Adopt)	RM 8491
the Section 214 Process to the)	
Construction of Video Dialtone)	
Facilities)	
)	
Petition for Relief from Unjust and)	
Unreasonable Discrimination in the)	
Deployment of Video Dialtone Facilities)	

REPLY OF GTE

GTE Service Corporation and its affiliated
domestic telephone operating companies

John F. Raposa, HQE03J27
GTE Service Corporation
P.O. Box 152092
Irving, TX 75015-2092
(214) 718-6969

Gail L. Polivy
1850 M Street, N.W.
Suite 1200
Washington, DC 20036
(202) 463-5214

July 27, 1994

Their Attorneys

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SUMMARY

In Oppositions and Comments to these Petitions, prospective video dialtone providers and public interest groups illustrate that the proposals made by Petitioners would significantly undermine the Commission's video dialtone policy of regulatory flexibility and substantially impede deployment of one of the building blocks of the national information infrastructure. On the other hand, parties supporting Petitioners would have the Commission saddle new and innovative video service providers with layer upon layer of additional regulation, which in a competitive market will only result in the preservation of monopoly service provisioning and pricing by the incumbent cable operator. There is no basis in fact to support Petitioners' proposal and sound public policy dictates that they be rejected.

With respect to GTE's own video dialtone offerings, GTE has not only stated its *intention* to avoid discrimination on the basis of race, ethnicity or income, it has *proven* that its video dialtone proposals are not exclusionary. GTE has provided demographic data specific to its proposed VDT service areas which conclusively establishes the irrelevancy of racial, ethnic and income characteristics to GTE's video dialtone plans.

Petitioners' universal service arguments, however well-intentioned, are misplaced. From the standpoint of rolling-out a competitive service offering -- such as video dialtone -- potential providers must ultimately base their plans on anticipated market demand, customer need and economic viability. As common carriers,

prospective VDT providers are required to provide non-discriminatory access to their service. However, this obligation cannot be equated with an absolute commitment to invest where there is insufficient demand to support that investment.

GTE remains committed to the goal of universal access to communications services for all Americans. GTE's video deployment plans have been intentionally designed to increase the availability of a wide range of voice, video, and data services to its subscribers over time without discrimination based on any income, race or ethnicity criteria. Nonetheless, if the Commission were to determine the necessity for examining universal service of video services on a more broad based scale, these questions should be examined in a comprehensive proceeding, examining all aspects of universal service, including the scope of the obligation, identification of all responsible video providers and funding obligations of all participants.

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REPLY OF GTE

GTE Service Corporation, on behalf of its affiliated domestic telephone operating companies (GTE), pursuant to Section 1.405(a) of the Commission's Rules,¹ respectfully submits this Reply to Comments and Oppositions to the Petition for Relief and Petition for Rulemaking (Petitions) filed on May 23, 1994 by the Center for Media Education, the Consumer Federation of America, the Office of Communication of the United Church of Christ, the National Association for the Advancement of Colored People and the National Council of La Raza (Petitioners).²

¹ 47 C.F.R. § 1.405(a).

² Petitioners urge the issuance of specific policy statements and interpretive and procedural rules purportedly designed to deter potential "redlining" of low-income and minority neighborhoods in the deployment of video dialtone networks. The Petition for Rulemaking also requests that the Commission initiate a proceeding to amend the rules governing the consideration of Section 214 video dialtone applications to include specific anti-redlining provisions.

I. INTRODUCTION

GTE opposed these Petitions for several reasons. First, as demonstrated in GTE's Section 214 video dialtone (VDT)³ applications filed on May 23, 1994 and in its Consolidated Opposition to Petitions to Deny those applications which was filed on July 20, 1994, GTE will make video services available to a broad cross-section of households within clusters of GTE telephone exchange areas that do not discriminate against any subscriber segment. Second, the Petitions seek to implement policies and procedures which are unnecessary and would further delay the introduction of competitive video services to the American public. Third, the imposition of additional regulatory hurdles would be imposed upon potential video dialtone providers alone, not existing cable operators. However, it is these prospective video dialtone providers -- potentially the only real competition to entrenched cable interests -- that will be making video services available to the very communities which cable operators have often eschewed.

Of the parties submitting comments in response to the Petitions, prospective video dialtone providers and public interest groups illustrate that the proposals made by Petitioners would significantly undermine the Commission's video dialtone policy of regulatory flexibility and substantially impede deployment of one of the building blocks of the national information infrastructure. In contrast, parties supporting Petitioners

³ See *Telephone Company - Cable Television Cross-Ownership Rules, Sections 63.54 - 63.58*, Second Report and Order, Recommendation to Congress, and Second Further Notice of Proposed Rulemaking, 7 FCC Rcd 5781 (1992) (*Video Dialtone Order*), *pets. for recon. pending, appeal pending sub nom. Mankato Citizens Telephone Co. v. Federal Communications Commission*, No. 92-1404 (D.C. Cir.).

would have this Commission saddle new and innovative video service providers with layer upon layer of additional regulation, which in a competitive market will only result in the preservation of monopoly service provisioning and pricing by the incumbent cable operator. These commenters, as well as the Petitioners themselves, have not demonstrated that the Commission's existing rules are insufficient to prevent improper discrimination in local video distribution markets. GTE urges the Commission to reject the Petitions and instead turn to the business of overseeing the development and ultimate delivery of new video service alternatives to the American consumer.

II. GTE'S PROPOSED VIDEO DIALTONE SERVING AREAS ARE INCLUSIVE OF ALL RACES AND INCOME LEVELS

Petitioners, in additional comments filed in this proceeding, contend that their Petitions do not make claims of "intentional discrimination," but are about "discriminatory effect." (Petitioners' Comments, at 2.) Petitioners claim that some pending video dialtone applications are exclusionary, despite the good intentions of the companies which submit them. GTE strongly objects to these overbroad and unfounded allegations. Neither Petitioners nor any other commenter in this proceeding has demonstrated that there is any evidence of "redlining" by GTE in the deployment of its video dialtone offerings. GTE has not only stated its intention to avoid discrimination on the basis of race, ethnicity or income, it has proven that its video dialtone proposals are not exclusionary. GTE's Consolidated Opposition to Petitions to Deny its four pending video dialtone applications provided demographic data specific to GTE's proposed VDT service areas which conclusively establishes the irrelevancy of racial, ethnic and income characteristics to its video dialtone plans. This data is also provided in Exhibit A to this Reply.

In accordance with its VDT plans, GTE projects that its video dialtone services will result in 85% of homes passed in a given market within approximately three years of construction start, and will extend to a variety of populations, neighborhoods and communities. GTE's selection criteria for its initial video dialtone build-out examined population density, status of competition and programming availability, but categorically did not take into consideration race, ethnicity or income figures. Within a market, GTE has no plans to bypass any geographic area unless such an area contains multi-dwelling structures or owner associations with which GTE is unable to negotiate access or if an area is characterized by extremely low population density.

As evidenced by the data provided in Exhibit A, the effect of GTE's video dialtone plans is to include subscribers across all races and income levels. Accordingly, GTE strongly concurs with US West (Opposition, at 3) that absent any evidence that Petitioners' constituents have actually been harmed, the Commission has no basis to grant the alleged relief claimed or to establish a separate rulemaking proceeding. Clearly the allegations of "redlining" relative to GTE are groundless. There is consequently no reason to grant the relief that the Petitions request.

III. UNIVERSAL SERVICE OBLIGATIONS SHOULD FOCUS ON THE WIDESPREAD DELIVERY AND AVAILABILITY OF VIDEO SERVICES TO ALL CONSUMERS BY ALL VIDEO DISTRIBUTION PROVIDERS

Petitioners and several other commenters insist that the Commission extend the concept of universal service, as it is applied to basic telephone service today, to video dialtone offerings. In their additional comments, Petitioners claim that they are not requesting that universal service be re-defined, only that the goal of video dialtone should be universal service.

While GTE believes that Petitioners are well intentioned, Petitioners' suggested method of preventing anti-discriminatory effect is misplaced. The Commission, in its Video Dialtone⁴ Order, framed the universal service obligation for video dialtone providers as seeking "...to make available, in response to market demand, nationwide, publicly accessible, advanced telecommunications networks able to provide adequate facilities at reasonable charges." Thus, the Commission recognized that development and widespread deployment of video dialtone could be achieved if prospective VDT providers are allowed to design and deliver competitive video services to consumers based upon the demands of the marketplace. Since these services are being introduced in a competitive environment, it is crucial that regulatory barriers not be erected which will curtail the very competition to entrenched cable interests that video dialtone can provide. From the standpoint of rolling-out a competitive service offering -- such as video dialtone -- potential providers must ultimately base their plans on anticipated market demand, customer need and economic viability. As common carriers, prospective VDT providers are required to provide non-discriminatory access to their service. However, this obligation cannot be equated with an absolute commitment to invest where there is insufficient demand to support that investment. The Commission's regulatory framework for video dialtone, i.e., a flexible regulation that can accommodate inevitable market and technological changes as well as ease of use,⁵ provides the greatest opportunity for all customers to obtain access to both basic and enhanced video services.

⁴ *Video Dialtone Order, 7 FCC Rcd at 5806 (¶47).*

⁵ *Video Dialtone Order, 7 FCC Rcd at 5803-04 (¶¶ 41, 42).*

Contrary to their protestations, Petitioners do indeed suggest a re-definition of universal service. There is no current consensus among policy makers, user groups or telecommunications companies that video dialtone is or should be a component of universal service as it exists today for telephony. Indeed, while future inclusion of video services in universal service is possible, there are many complex issues to be addressed, including the scope of such universal service applications, the identification of appropriate market participants and funding obligations. Certainly, the 214 Application process is not an appropriate vehicle to fully address the many complex issues related to the concept of universal service.

In the context of advanced video markets, where tangible service alternatives are or will soon be made available to subscribers, universal service issues must address the total range of services that are being offered in a broad geographical area as a whole. Today, cable service is available to approximately 95% of all households.⁶ In rural or isolated areas, other technologies, such as wireless and home satellite services, bring video services to customers not served by wired systems. Even in those markets where wireline cable companies operate, emerging alternative forms of distribution, such as wireless, direct broadcast satellite, cable overbuilds and others, may ultimately provide real competitive choices for consumers.⁷ LEC video dialtone

⁶ *Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992: Rate Regulation; Buy-Through Prohibition*, Third Order on Reconsideration, FCC 94-40, released March 30, 1994.

⁷ The Commission has recently identified numerous alternatives to traditional cable delivery systems in its inquiry into the scope of emerging competition in the video programming distribution markets. See *Implementation of Section 19 of the Cable television Consumer protection and Competition Act of 1992: Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming*, Notice of Inquiry, FCC 94-119, released May 19, 1994, ¶18.

offerings will be only one of many such delivery systems that consumers will be able to choose from, for not only basic cable offerings, but on-demand and interactive services as well. Thus, any evaluation of universal service obligations in such a market must look across all networks and providers to determine if subscribers have fair and equal access to a broad range of video services. Universal service issues must not be focused narrowly on specific LEC video dialtone networks alone, but must encompass all providers in the market.

By insisting that specific universal service goals be required of video dialtone, these commenters are effectively suggesting that if consumers do not have access immediately, or in the very near future, to VDT networks, such users will be "bypassed" by the information superhighway. This premise is simply untrue. Existing cable operators, wireless and other video providers are currently testing and evaluating the same capabilities as are prospective VDT providers including GTE. These capabilities include digital compression, encryption technology and interactive services. To presume that subscribers who are not served by LEC video dialtone networks would be precluded from receiving any benefits of advanced technologies, and therefore will be "left behind," is unsubstantiated and unrealistic.⁸

⁸ Petitioners would also place the burden of universal service for video services on the LECs alone (Petition, at 14), but offer no suggestion how this should be funded. Of course, the Michigan Public Service Commission staff (at 1) argues that no VDT provider has demonstrated that provision of VDT service on a universal basis would require any cost subsidies. However, if any one provider is saddled with an entire industry's universal service obligation, it cannot possibly sustain rate levels that would be sufficient in a competitive market without some type of funding mechanism.

GTE remains committed to the goal of universal access to communications services for all Americans. GTE's video deployment plans have been intentionally designed to increase the availability of a wide range of voice, video, and data services to its subscribers over time without discrimination based on any income, race or ethnicity criteria. GTE contends that the present video dial tone offerings by LECs, in and of themselves, do not present a compelling need for the Commission to address universal service issues. However, if the Commission were to determine the necessity for examining universal service of video services on a more broad based scale, these questions should be examined in a comprehensive proceeding, examining all aspects of universal service, including the scope of the obligation, identification of all responsible video providers and funding obligations of all participants.⁹ Furthermore, universal telecommunications service should be based on an essential set of services, not specific technologies, available to the public at a reasonable price.

In Summary: Universal service of basic and enhanced video services must focus on answering whether subscribers have fair and equal access to a broad range of video services across all networks and providers. Universal service issues must not be focused narrowly on specific video dialtone offerings and must not be allowed to impede an already burdensome Section 214 process. If necessary, any examination of universal service involving video offerings must occur with a comprehensive proceeding involving all video market participants.

⁹ Universal service issues are currently being addressed in a number of forums, including NARUC, the Commission and Congress.

IV. VIDEO DIALTONE OFFERINGS CANNOT PROPERLY BE MADE SUBJECT TO ADDITIONAL FEDERAL AND LOCAL REGULATION IF THE POLICY OF REGULATORY FLEXIBILITY AND THE CORRESPONDING BENEFITS OF VIDEO DIALTONE ARE TO BE ACHIEVED.

Most commenters supporting the Petitions argue that the rules governing the Section 214 process must be amended to include specific anti-redlining provisions and data submission requirements. *E.g.*, Council of 100, at 3; Pennsylvania Public Utilities Commission, at 2. However, virtually all parties opposing the Petitions persuasively establish that additional regulatory barriers would discourage entry into the video marketplace by alternative video service providers and will merely serve to confirm the monopoly positions of entrenched cable interests. *E.g.*, Southwestern Bell, at 3-4; U S West, at 3; Bell Atlantic, at 5. Although the Commission has recently approved its first commercial video dialtone offering, a substantial backlog of video dialtone applications still remains. As the United Homeowner's Association (at 3) observes (the only party commenting in this proceeding that directly represents consumers), adding new requirements to the Section 214 process would only further delay the approval of pending and prospective video dialtone applications.

The Commission has determined that its current rules provide adequate safeguards against potential discriminatory conduct and abuses by LECs. Video Dialtone Order, 7 FCC Rcd at 5827. As many commenters point out, the Commission is already empowered to take any reasonable action it deems necessary to remedy discriminatory conduct. The Section 214 and common carrier tariff review processes provide more than adequate opportunities for review of proposed video dialtone offerings and for the Commission to order any revision to such offerings if they are

deemed to be in violation of its Rules or the Act.¹⁰ Further, the Commission has the authority to impose specific conditions that it finds necessary to individual video dialtone providers and has done so already.¹¹ In contrast, Petitioners and their supporters provide no evidence that the existing Commission Rules will not protect consumers from discriminatory behavior.

The Local Community Coalition (LCC) insists that exchange carriers be subject to not only expanded Section 214 rules, but the full range of cable television regulation as well. LCC would have regulations now imposed on cable monopolies in non-competitive markets, extended to LEC video dialtone offerings, operating in a competitive environment. From both an economic and regulatory perspective, these suggestions make absolutely no sense. Once cable operators are subject to effective competition, they are no longer subject to the Commission's rate regulations. However, video dialtone offerings would be subject to all local franchise and Commission cable regulations.¹² Tying the hands of one viable participant in a competitive market while allowing others unbridled freedom to price and offer services as they see fit would only serve to restrict consumer choice and pricing decisions, stifle technological and infrastructure improvement, and create artificial barriers to market entry. Clearly, as the

¹⁰ Section 202(a) of the Act requires that tariffed services be generally available within the applicant's serving territories.

¹¹ In re New Jersey Bell Telephone Company, FCC 94-180, released July 18, 1994.

¹² GTE already has the authority under state franchises to utilize local rights-of-way for placement of its communications network. GTE also pays significant state and local taxes on property, sales, and other bases as required by federal, state and local statutes and customs.

voice and video marketplaces converge, the overriding policy goal must be the achievement of regulatory parity.

The Commission has already ruled that LEC video dialtone offerings would be regulated as a Title II interstate common carrier service -- and that LECs would not be treated as traditional cable operators, subject to local franchising requirements.¹³ LECs, as video dialtone providers, will simply be offering the underlying transport for video signals, with programming decisions separately made by the programmer-customer. LCC's comments should be dismissed as they should be more appropriately be addressed in petitions for reconsideration of the Video Dialtone Order and go far beyond the issues presented in the Petitions.¹⁴

There is, however, one point that most parties in this proceeding agree upon - the Commission's 214 process is an ineffective vehicle for addressing resolved video dialtone issues. The Commission must streamline the process or, more appropriately, abandon it completely. Oversight of new video services can adequately be fulfilled by the Commission's tariff approval procedures.¹⁵

¹³ 7 FCC Rcd 300 (1991); 7 FCC Rcd 5069 (1992).

¹⁴ Similarly, the comments of the American Public Television Association that video dialtone providers be required to carry public television stations at a free or reduced rate are subject to petitions for reconsideration of the *Video Dialtone Order*.

¹⁵ In the tariff process, the Commission may investigate whether any exchange carrier filings violate Commission rules or policies, including whether the proposed offering would provide undue preferences for any category of subscriber. In addition, the tariff review process is open to public comment and review, providing Petitioners -- and all other interested participants -- with opportunity to comment on any aspect of the prospective video dialtone provider's filing.

In Summary: The Commission has already determined, in its Video Dialtone Order and in subsequent approvals of LEC video dialtone applications, that its rules provide adequate consumer safeguards against discrimination. LECs providing video dialtone services will not be regulated as cable operators nor will they be subject to local franchising requirements. The comments supporting the Petitions do not offer any credible reasons for initiating a separate rulemaking to expand Section 214 requirements or extend cable operator regulations to LECs and should, therefore, be dismissed.

V. CONCLUSION

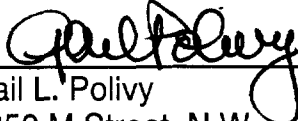
For the reasons stated hereinabove, GTE respectfully urges the Commission to deny the Petitions. Petitioners' proposals would only undermine the Commission's video dialtone policy and impede deployment of the national information infrastructure.

Respectfully submitted,

GTE Service Corporation and its affiliated
domestic telephone operating companies

John F. Raposa, HQE03J27
GTE Service Corporation
P.O. Box 152092
Irving, TX 75015-2092
(214) 718-6969

By



Gail L. Polivy
1850 M Street, N.W.
Suite 1200
Washington, DC 20036
(202) 463-5214

July 27, 1994

Their Attorneys

EXHIBIT A

Residential demographics on areas covered by GTE's 214 applications for Video Services in California, Florida, Hawaii and Virginia

□ CALIFORNIA

	<u>Video Services Areas</u>	<u>Telephony Serving Areas</u>
Whites:	74 percent	72 percent
All Minorities:	26 percent	28 percent
Per Capita Income:	\$17,247	\$17,249

□ FLORIDA

	<u>Video Services Areas</u>	<u>Telephony Serving Areas</u>
Whites:	92 percent	88 percent
All Minorities:	8 percent	12 percent
Per Capita Income:	\$15,155	\$14,795

□ HAWAII

	<u>Video Services Areas</u>	<u>Telephony Serving Areas</u>
Whites:	34 percent	33 percent
All Minorities:	66 percent	67 percent
Per Capita Income:	\$16,010	\$16,058

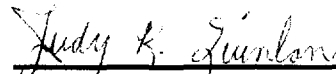
□ VIRGINIA

	<u>Video Services Areas</u>	<u>Telephony Serving Areas</u>
Whites:	83 percent	80 percent
All Minorities:	17 percent	20 percent
Per Capita Income	\$19,026	\$14,397

SOURCE: 1990 U.S. Census Population Report

Certificate of Service

I, Judy R. Quinlan, hereby certify that copies of the foregoing "Reply of GTE" have been mailed by first class United States mail, postage prepaid, on the 27th day of July, 1994 to all parties of record.

A handwritten signature in cursive script, reading "Judy R. Quinlan", is written over a solid horizontal line.

Judy R. Quinlan

GTE Federal Political Action Club

1993 Annual Report

GTE POLITICAL ACTION CLUB
1993 ANNUAL REPORT

GTE POLITICAL ACTION CLUB

1993 ANNUAL REPORT

U.S. HOUSE OF REPRESENTATIVES

<u>Alabama</u>	<u>Amount</u>
Rep. Bud Cramer (D)	\$ 500
 <u>Arizona</u>	
Rep. Jon Kyl (R)	750
Rep. Jim Kolbe (R)	500
 <u>California</u>	
Rep. Bob Matsui (D)	2,000
Rep. Sam Farr (D)	1,000
Rep. Lynn Schenk (D)	1,000
Rep. George Brown (D)	1,000
Rep. Vic Fazio (D)	1,000
Rep. Richard Lehman (D)	750
Rep. Jane Harman (D)	600
Rep. Jerry Lewis (R)	500
Rep. Bill Baker (R)	500
Rep. Carlos J. Moorhead (R)	500
Rep. Howard "Buck" McKeon (R)	500
Rep. Ken Calvert (R)	500
Rep. Lynn Woolsey (D)	500
Rep. Jay Kim (R)	300
Rep. Richard Pombo (R)	250
Rep. Ed Royce (R)	250
 <u>Colorado</u>	
Rep. Joel Hefley (R)	500
 <u>Connecticut</u>	
Rep. Gary Franks (R)	1,000
Rep. Nancy Johnson (R)	1,000
Rep. Sam Gejdenson (D)	500
 <u>Florida</u>	
Rep. Cliff Stearns(R)	1,500
Rep. Sam Gibbons (D)	1,000
Rep. John Mica (R)	1,000
Rep. Dan Miller (R)	1,000

GTE POLITICAL ACTION CLUB 1993 ANNUAL REPORT

<u>Kansas</u>	<u>Amount</u>
Rep. Jim Slattery (D)	\$ 1,000
 <u>Louisiana</u>	
Rep. Billy Tauzin (D)	1,000
Rep. Bob Livingston (R)	500
 <u>Maine</u>	
Rep. Olympia Snowe (R)	500
 <u>Massachusetts</u>	
Rep. Joe Moakley (D)	1,000
 <u>Michigan</u>	
Rep. Dave Camp (R)	1,700
Rep. Dale Kildee (D)	1,000
Rep. Fred Upton (R)	1,000
Rep. Bob Carr (D)	1,000
Rep. John Dingell (D)	1,000
Rep. Vernon Ehlers (R)	1,000
Rep. William Ford (D)	700
Rep. Bart Stupak (D)	600
Rep. Jim Barcia (D)	500
Rep. Sander Levin (D)	300
 <u>Mississippi</u>	
Rep. G.V. Sonny Montgomery (D)	1,000
Rep. David M. Halbrook (D)	250
 <u>Missouri</u>	
Rep. Richard Gephardt (D)	5,000
Rep. Alan Wheat (D)	2,000
 <u>Nevada</u>	
Rep. Barbara Vucanovich (R)	1,000
 <u>New Hampshire</u>	
Rep. Dick Swett (D)	500
Rep. Bill Zeff (R)	300

GTE POLITICAL ACTION CLUB 1993 ANNUAL REPORT

<u>Florida, continued</u>	<u>Amount</u>
Rep. Ileana Ros-Lehtinen (R)	\$ 1,000
Rep. Pete Peterson (D)	750
Rep. Peter Deutsch (D)	500
Rep. Harry Johnston (D)	500
Rep. Earl Hutto (D)	500
Rep. Bill Young (D)	500
 <u>Georgia</u>	
Rep. Newt Gingrich (R)	2,000
Rep. Nathan Deal (D)	350
Rep. Cynthia McKinney (D)	350
 <u>Hawaii</u>	
Rep. Patsy Mink (D)	500
Rep. Neil Abercrombie (D)	250
 <u>Idaho</u>	
Rep. Michael Crapo (R)	500
Rep. Larry LaRocco (D)	100
 <u>Illinois</u>	
Rep. Dennis Hastert (R)	3,000
Rep. Thomas Ewing (R)	2,500
Rep. Bob Michel (R)	2,000
Rep. Jerry Costello (D)	1,000
Rep. Don Manzullo (R)	200
 <u>Indiana</u>	
Rep. Jill Long (D)	1,000
Rep. Tim Roemer (D)	500
Rep. Dan Burton (R)	500
Rep. Phil Sharp (D)	500
Rep. John Meyers (R)	480
 <u>Iowa</u>	
Rep. Fred Grandy (R)	4,250
Rep. Jim Lightfoot (R)	500
Rep. Neal Smith (D)	250

GTE POLITICAL ACTION CLUB 1993 ANNUAL REPORT

<u>Kansas</u>	<u>Amount</u>
Rep. Jim Slattery (D)	\$ 1,000
 <u>Louisiana</u>	
Rep. Billy Tauzin (D)	1,000
Rep. Bob Livingston (R)	500
 <u>Maine</u>	
Rep. Olympia Snowe (R)	500
 <u>Massachusetts</u>	
Rep. Joe Moakley (D)	1,000
 <u>Michigan</u>	
Rep. Dave Camp (R)	1,700
Rep. Dale Kildee (D)	1,000
Rep. Fred Upton (R)	1,000
Rep. Bob Carr (D)	1,000
Rep. John Dingell (D)	1,000
Rep. Vernon Ehlers (R)	1,000
Rep. William Ford (D)	700
Rep. Bart Stupak (D)	600
Rep. Jim Barcia (D)	500
Rep. Sander Levin (D)	300
 <u>Mississippi</u>	
Rep. G. V. Sonny Montgomery (D)	1,000
Rep. David M. Halbrook (D)	250
 <u>Missouri</u>	
Rep. Richard Gephardt (D)	5,000
Rep. Alan Wheat (D)	2,000
 <u>Nevada</u>	
Rep. Barbara Vucanovich (R)	1,000
 <u>New Hampshire</u>	
Rep. Dick Swett (D)	500
Rep. Bill Zeff (R)	300

GTE POLITICAL ACTION CLUB 1993 ANNUAL REPORT

<u>Oregon</u>	<u>Amount</u>
Rep. Elizabeth Furse (D)	\$ 1,000
Rep. Mike Kopetski (D)	500
Rep. Ron Wyden (D)	500
Rep. Peter DeFazio (D)	200
 <u>Pennsylvania</u>	
Rep. John P. Murtha (D)	1,000
Rep. Marjorie Margolies Mezvinsky (D)	1,000
Rep. William F. Clinger (R)	950
Rep. George Gekas (R)	800
Rep. Bob Walker (R)	500
Rep. Jim Greenwood (R)	500
Rep. Austin Murphy (D)	200
 <u>South Carolina</u>	
Rep. Floyd Spence (R)	500
Rep. Butler Derrick (D)	500
Rep. James Clyburn (D)	250
 <u>Tennessee</u>	
Rep. Don Sundquist (R)	3,000
Rep. Bart Gordon (D)	1,000
Rep. Jimmy Quillen (R)	1,000
Rep. Bob Clement (D)	500
Rep. John Duncan (R)	500
 <u>Texas</u>	
Rep. Sam Johnson (R)	1,600
Rep. Martin Frost (D)	1,500
Rep. Jack Fields (R)	1,500
Rep. Jim Chapman (D)	1,500
Rep. Charlie Wilson (D)	1,000
Rep. Henry Bonilla (R)	1,000
Rep. Jack Brooks (D)	1,000
Rep. Bill Sarpalius (D)	1,000
Rep. Greg Laughlin (D)	1,000
Rep. Ron Coleman (D)	750
Rep. Lamar Smith (R)	750
Rep. John Bryant (D)	750
Rep. Solomon Ortiz (D)	500